

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-10390-IT
)	
CRISHANTY AYBAR ARIAS,)	
)	
Defendant.)	

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(a)

The United States and counsel for the Defendant file this joint memorandum pursuant to Local Rule 116.5(a), stating the following:

1. The government has provided automatic discovery. Defendant has asked the government to identify the confidential informant who allegedly made controlled purchases of narcotics from the defendant. The government has denied this request. Defendant intends to file a motion to compel.
2. Defendant does not anticipate requesting additional discovery.
3. It does not appear at this time that there is a need for a protective order regarding the dissemination of sensitive information.
4. Defendant has not yet decided whether he will file any pretrial motions under Rule 12(b).
5. The parties agree that the government will provide expert disclosures no later than four weeks before trial and the Defendant will provide expert disclosures no later than two weeks before trial.
6. The Court has previously excluded the period from October 10, 2019, through November 12, 2019, for the purposes of the Speedy Trial Act. The parties agree that the period

between November 12, 2019, and the date of the interim status conference requested in paragraph 8 be excluded pursuant to 18 U.S.C. § 3161(h)(7)(a). The parties submit that the ends of justice served by permitting defense counsel to review and evaluate the discovery outweighs the best interest of the public and the Defendant in a speedy trial.

7. The parties have not yet had an opportunity to discuss a possible plea. They estimate that a trial will take two to three days.

8. The parties request that the interim status conference be scheduled during the week of January 13, 2020.

Respectfully submitted,

CRISHANTY AYBAR ARIAS
By his attorney,

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Certificate of Service

I certify that, on November 5, 2019, this document filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christine Wichers
Christine Wichers